
From: Eric Schaffer
Sent: Tuesday, April 18, 2023 1:29 PM CDT
To: Rukavina, Davor
CC: Guffy, Philip; Funk, Brenda; Clarke, Brian; Silverstein, Paul; Dunn, Jeff
Subject: RE: [EXT] RE: Goodman/Prosperity Coordination and Cooperation
Attachments: Goodman--Bondholder UCC Analysis re Prosperity Funds.DOCX

Attached is the requested analysis. Happy to chat.

From: Rukavina, Davor <drukavina@munsch.com>
Sent: Tuesday, April 18, 2023 12:45 PM
To: Eric Schaffer <eschaffer@stonecipherlaw.com>
Cc: Guffy, Philip <PGuffy@hunton.com>; Funk, Brenda <bfunk@munsch.com>; Clarke, Brian <BrianClarke@andrewskurth.com>; Silverstein, Paul <PaulSilverstein@andrewskurth.com>; Dunn, Jeff <jdunn@Munsch.com>
Subject: RE: [EXT] RE: Goodman/Prosperity Coordination and Cooperation

Confirmed.

Davor Rukavina, Esq.

Munsch Hardt Kopf & Harr, P.C.
500 N. Akard Street, Suite 3800 / Dallas, Texas 75201-6659

Direct: +1.214.855.7587 / drukavina@munsch.com / munsch.com

From: Eric Schaffer <eschaffer@stonecipherlaw.com>
Sent: Tuesday, April 18, 2023 11:44 AM
To: Rukavina, Davor <drukavina@munsch.com>
Cc: Guffy, Philip <PGuffy@hunton.com>; Funk, Brenda <bfunk@munsch.com>; Clarke, Brian <BrianClarke@andrewskurth.com>; Silverstein, Paul <PaulSilverstein@andrewskurth.com>; Dunn, Jeff <jdunn@Munsch.com>
Subject: RE: [EXT] RE: Goodman/Prosperity Coordination and Cooperation

External Email: Use caution with links and attachments.

Thanks, Davor.

If we are assured of a reasonable opportunity to object to any legal process that would require production, this works. If you can confirm that, I think we have our outline just about ready to send over.

Regards,
Eric

From: Rukavina, Davor <drukavina@munsch.com>
Sent: Tuesday, April 18, 2023 11:52 AM
To: Eric Schaffer <eschaffer@stonecipherlaw.com>
Cc: Guffy, Philip <PGuffy@hunton.com>; Funk, Brenda <bfunk@munsch.com>; Clarke, Brian <BrianClarke@andrewskurth.com>; Silverstein, Paul <PaulSilverstein@andrewskurth.com>; Dunn, Jeff <jdunn@Munsch.com>
Subject: [EXT] RE: Goodman/Prosperity Coordination and Cooperation

Eric:

Yes, I confirm. Obviously, if the Trustee is served with legal process requiring a production, then he will have to comply, but I will let you know promptly if that occurs so that you and/or I can take appropriate action.

Will that work?

Davor Rukavina, Esq.

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From: Eric Schaffer <eschaffer@stonecipherlaw.com>
Sent: Monday, April 17, 2023 10:54 AM
To: Rukavina, Davor <drukavina@munsch.com>
Cc: Guffy, Philip <PGuffy@hunton.com>; Funk, Brenda <bfunk@munsch.com>; Clarke, Brian <BrianClarke@andrewskurth.com>; Silverstein, Paul <PaulSilverstein@andrewskurth.com>; Dunn, Jeff <jdunn@Munsch.com>
Subject: Goodman/Prosperity Coordination and Cooperation

External Email: Use caution with links and attachments.

Davor,

We appreciated the opportunity to talk with you and your colleagues on Saturday. As I noted at the end of the call, our clients have a common interest in seeking approval of the Trustee's motion. With that in mind, I asked you to confirm that our analysis and authorities would not be shared with counsel for FedEx or others.

Regards,
Eric

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